

Kessler and Gehman Associates, Inc. ("KGA"), is a professional engineering firm specializing in the design of telecommunications systems, having been involved in virtually every phase of TV and FM broadcast, MDS/ITFS, microwave and two-way radio communications systems. While the firm maintains a dialogue with equipment suppliers, contractors and manufacturers of television, radio and telecommunications equipment, its relationship to such companies is limited solely to the contacts necessary for the planning and implementation of systems for the firm's clients. The firm engages only in providing consulting services to its clients, and is thus not involved in the promotion, manufacture, sale or installation of any equipment.

KGA supports the goals delineated in the paper entitled, "A Proposal for Revising the MDS and ITFS Regulatory Regime," submitted by the Wireless Communications Association International, Inc., the National ITFS Association and the Catholic Television Network" submitted to the FCC on October 7, 2002. KGA has participated in the design and licensing of ITFS stations for more than 35 years. We have also assisted clients in the design and licensing of many MMDS stations ever since the FCC created that service. From time to time the FCC has changed the ITFS and MDS rules to permit the use of new technologies. These rule-changes have been more frequent in recent years due to the rapid changes in technology. The scope of the current proposed changes incorporate the concept of a technology-agnostic, flexible-use spectrum to the maximum extent possible which will allow the MDS and ITFS licensees and operators to implement the latest technologies without the time consuming process of more rule changes in the near future.